

GORMAN & WILLIAMS

ATTORNEYS AT LAW
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

CHARLES L. SIMMONS, P.C.
CLSIMMONS@GANDWLAW.COM

TWO NORTH CHARLES STREET
BALTIMORE, MD 21201

TELEPHONE
410-528-0600
FACSIMILE
410-528-0602

ADMITTED IN MARYLAND AND
THE DISTRICT OF COLUMBIA

November 25, 2003

**VIA FACSIMILE AND
FIRST CLASS MAIL**

George Borden, Esq.
Williams & Connolly, LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005

RE: Russian Research Center Kurchatov Institute v.
v. Western Services Corp., et al.
Civil Action No.: AMD 02-3878

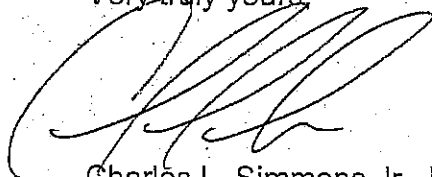
Dear George:

This will follow up my letter to you dated November 21. That letter should be considered GSE's written objection to the designation by WSC and Mr. Utmel of Richard D. Clark's report as confidential.

Paragraph 7 of the Protective Order Of Confidentiality places the burden of maintaining the confidentiality of a document on the designating party. Thus, it is WSC's obligation to seek a Court order to preserve the confidentiality of the undated report prepared by Mr. Clark and sent by facsimile by Ms. Sagerson on November 3, 2003.

As previously stated, I do not believe it appropriate that Mr. Clark's report is shielded from client review by your "confidential" designation. Clients in general, and GSE in this case, should be permitted to review and consider expert reports, particularly those reports that set forth a party's damages claim. I urge you and your clients to reconsider the unreasonable position taken on this issue.

Very truly yours,



Charles L. Simmons Jr., P.C.